

Miller, Diane M. (CDC/NIOSH/EID)

From: anaya@prodigy.net
Sent: Friday, February 04, 2011 11:53 AM
To: NIOSH Docket Office (CDC); NIOSH Docket Office (CDC)
Cc: Szalajda, Jonathan V. (CDC/NIOSH/NPPTL)
Subject: NIOSH Docket 147, re-evaluation of the NIOSH policy on emergency escape support breathing system, or "buddy breather" device used with open-circuit self-contained breathing apparatus
Attachments: Ltr for Docket 147.pdf

To Whom It May Concern:

Please accept this position letter for NIOSH Docket 147.

Thank you,

Chris Anaya
(916) 215-8100 c

January 29, 2011

2056 Portsmouth Drive
El Dorado Hills, CA 95762
(916) 939-7000

NIOSH Mailstop: C-34
Robert A. Taft Lab
4676 Columbia Parkway
Cincinnati, OH 45226

SUBJECT: NIOSH Docket 147, re-evaluation of the NIOSH policy on emergency escape support breathing system, or "buddy breather" device used with open-circuit self-contained breathing apparatus

To Whom It May Concern,

I write as a California firefighter with 25 years experience who sits on a number of fire-related health and safety committees, as well as respiratory protection committees and sub-committees. More important, I write as a proponent of Buddy Breathing Devices ("BBD") and their use.

I would like to begin by expressing my heartfelt thanks and gratitude to NIOSH staff for its good work in providing a public review of its 1984 interpretive policy that currently prohibits the testing and certification of BBDs that are commonly found on today's Self-Contained Breathing Apparatuses ("SCBAs").

An estimated 62,000 California firefighters have been allowed to train with and use BBDs for more than 25 years now. To date, not a single citation for misuse, injury or death related to BBD use has ever been issued by Cal-OSHA. Moreover, according to SCBA manufacturers, the vast majority of all SCBAs sold in the United States have BBDs installed. If true, how many more firefighters today regularly train with and are prepared to use BBDs without issue, outside of California?

Technological advances in today's SCBAs have made the practice of buddy breathing much safer than in the past. Unlike SCBA equipment of the past, today's SCBAs include umbilical hoses with quick connect and disconnect couplings that do not require a firefighter to remove his/her mask and be exposed to IDLH atmosphere. Because of these and other advances, along with BBDs wide-spread use, the basis for NIOSH's prohibition appears to be out-dated, therefore, unwarranted.

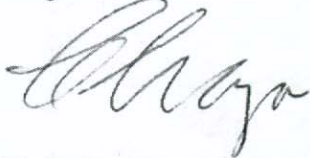
I believe NIOSH's current policy conflicts with DOSH regulation and today's best work practices for firefighters. If not corrected, the inconsistency may someday place firefighters in harm's way since BBDs are not required to be evaluated by NIOSH for the purpose of sharing air with another. Equally troublesome, or perhaps more crucial, without an updated policy change at NIOSH, some fire and/or regulatory authorities may continue to deny their firefighters the right to have access to this potentially life-saving technology.

Recent fatalities outside California involving firefighters attempting to share air with a single mask should be a painful reminder that firefighters will do whatever is necessary to save one another, regardless of regulatory approval or method used. Although one cannot say the outcome would have been any different if those firefighters had BBDs available to them, I believe BBDs would have surely bought them more time for possible escape or rescue, and without premature exposure to IDLH atmosphere.

In conclusion, I believe it is important for NIOSH to move as quickly as possible to update its policy to a position that approves BBDs for emergency use, when all other options have been exhausted.

Thank you for considering this request.

Respectfully,

A handwritten signature in cursive script, appearing to read "Chris Anaya".

Chris Anaya